



Interstate Telcom Consulting, Inc.

Independent Telecommunications Consultants

DOCKET FILE COPY ORIGINAL

Received & Inspected

JUN 27 2014

FCC Mail Room

June 26, 2014

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

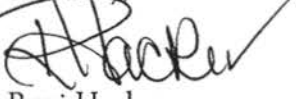
Mr. Jeff Richter
PSC - Wisconsin
PO Box 7854
Madison, WI 53707

Re: WC Docket No. 10-90, 11-42 and 14-58: Form 481 - Annual Reporting Requirements for High-Cost and Low Income Recipients

Pursuant to Section 54.313 and 54.422 of the Federal Communications Commission's rules, enclosed is a redacted version of Form 481 Annual Reporting Requirements and Certifications for Wittenberg Telephone Company, Study Area Code 330973. Wittenberg Telephone Company is a state-designated ETC, and as such, is submitting to the Commission information from FCC Form 481. A confidential "Trade Secret" filing of this information was also made under Docket 10-90, 11-42 and 14-58.

Should you have any questions, please contact me via e-mail at roxih@interstatetelcom.com or by phone at 320/848-6641.

Sincerely,



Roxi Hacker
Regulatory Consultant

Enclosures:

Cc: Al Mahnke

No. of Copies rec'd
List ABCDE

091

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code 330973
 <015> Study Area Name WITTENBERG TEL CO
 <020> Program Year 2015
 <030> Contact Name: Person USAC should contact with questions about this data Roxanne Hacker
 <035> Contact Telephone Number: 3208486641 ext. Number of the person identified in data line <030>
 <039> Contact Email Address: roxih@interstatetelcom.com Email of the person identified in data line <030>

Received & Inspected

JUN 27 2014

FCC Mail Room

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 330973WI510Wittenberg.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 330973WI610Wittenberg.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> 330973WI1010Wittenberg.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

330973WI110Wittenberg.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetel.com.com

[illegible]

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@winterstatetelcom.com

[illegible]

(800) Operating Companies
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxah@interstatetel.com

<810>	Reporting Carrier	Wittenberg Telephone Company
<811>	Holding Company	
<812>	Operating Company	Wittenberg Telephone Company

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation

-- See attached worksheet --

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 330973
 <015> Study Area Name WITTENBERG TEL CO
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Roxanne Hacker
 <035> Contact Telephone Number - Number of person identified in data line <030> 3208486641 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> roxih@interstatetelcom.com

<910> Tribal Land(s) on which ETC Serves

Ho-Chunk Nation
 PO Box 667
 Black River Falls, WI 54615


<920> Tribal Government Engagement Obligation

330973WI900Wittenberg.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
 <922> Feasibility and sustainability planning;
 <923> Marketing services in a culturally sensitive manner;
 <924> Compliance with Rights of way processes
 <925> Compliance with Land Use permitting requirements
 <926> Compliance with Facilities Siting rules
 <927> Compliance with Environmental Review processes
 <928> Compliance with Cultural Preservation review processes
 <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)
NA

NA
NA
NA
NA
NA
NA
NA
NA

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers**Lifeline****Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

330973WI1210Wittenberg.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation**Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)} ☐
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)} ☐

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Certification ☐
- <2013> 2014 Frozen Support Certification ☐
- <2014> 2015 Frozen Support Certification ☐
- <2015> 2016 and future Frozen Support Certification ☐

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband ☐

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification ☐
- <2018> 5th year Broadband Service Certification ☐
- <2019> Interim Progress Certification ☐
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection FormFCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 330973
 <015> Study Area Name WITTENBERG TEL CO
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Roxanne Hacker
 <035> Contact Telephone Number - Number of person identified in data line <030> 3208486641 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> roxi@interstatetel.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan
 Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
 (3014) If yes, does your company file the RUS annual report

(Yes/No)
 (Yes/No)

☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☒
 (3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, is your company audited?

(Yes/No)

☐ ☐

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

- (3023) Underlying information subjected to a review by an independent certified public accountant ☐

- (3024) Underlying information subjected to an officer certification. ☐

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	330973
<015> Study Area Name	WITTENBERG TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035> Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	330973
<015> Study Area Name	WITTENBERG TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035> Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetelcom.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>ITCI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: <u>ITCI</u>	
Name of Reporting Carrier: <u>WITTENBERG TEL CO</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>06/25/2014</u>
Printed name of Authorized Officer: <u>Allen Mahnke</u>	
Title or position of Authorized Officer: <u>CBO</u>	
Telephone number of Authorized Officer: <u>7152532111 ext.</u>	
Study Area Code of Reporting Carrier: <u>330973</u>	Filing Due Date for this form: <u>07/01/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: <u>WITTENBERG TEL CO</u>	
Name of Authorized Agent or Employee of Agent: <u>ITCI</u>	
Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u>	Date: <u>06/25/2014</u>
Printed name of Authorized Agent or Employee of Agent: <u>Roxi Hacker</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Regulatory Consultant</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>3208486641 ext.</u>	
Study Area Code of Reporting Carrier: <u>330973</u>	Filing Due Date for this form: <u>07/01/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED – FOR PUBLIC INSPECTION

REDACTED:

Wittenberg Telephone Company

Five Year Quality of Service Plan

2015-2019

REDACTED – FOR PUBLIC INSPECTION

SAC: 330973

State: Wisconsin

Wittenberg Telephone Company

Form 481 Line No.: 510 Compliance with Service Quality Standards and Consumer Protection

As required by the Wisconsin Public Service Commission (PSC) Chapter 165 Rules, the local services provided by Wittenberg Telephone Company are provided under internal company operating procedures and publically available tariffs which are in compliance with applicable Wisconsin PSC orders and rules including:

**WI Chapter PSC 165
STANDARDS FOR TELECOMMUNICATIONS SERVICE**

165.010	General.	165.065	Emergency operation.
165.020	Definitions.	165.066	Protection of utility facilities.
165.031	Retention of records.	165.067	Interference with public service structures.
165.032	Schedules to be filed with the commission.	165.070	Provision for testing.
165.033	Exchange area boundaries.	165.071	Meter and recording equipment test facilities.
165.034	Utility accidents and interruptions.	165.072	Accuracy requirements.
165.040	Meter reading records.	165.073	Initial test.
165.041	Meter reading interval.	165.074	As-found tests.
165.042	Billing recording equipment.	165.075	Routine tests.
165.043	Information available to customers.	165.076	Request tests.
165.050	Customer billing.	165.077	Referee tests.
165.051	Deposits.	165.078	Test records.
165.052	Disconnection and refusal of service.	165.082	Traffic and operator rules.
165.0525	Deferred payment agreement.	165.083	Answering time objectives.
165.053	Customer complaints.	165.084	Dial service objectives.
165.0535	Dispute procedures.	165.085	Interoffice trunks.
165.054	Held applications.	165.086	Transmission requirements.
165.055	Directories.	165.087	Minimum transmission objectives.
165.060	Construction.	165.088	Public telephone service.
165.061	Maintenance of plant and equipment.	165.089	Interruptions of service.
165.062	Line fills.	165.090	Protective measures.
165.063	Central office equipment.	165.091	Safety program.
165.064	Interconnection service standards.		

SAC: 330973

State: Wisconsin

Wittenberg Telephone Company

Form 481 Line No: 610 Description of Functionality in Emergency Situations

Wittenberg Telephone Company pursuant to Wisconsin Public Service Commission rule "165.065 Emergency Operation" has:

- Established reasonable provisions to meet emergencies resulting from national security requirements, failures of lighting or power service, sudden and prolonged increases in traffic, illness or personnel, or from fire, storm, or similar emergencies. These provisions meet or exceed the rule requirement to provide:
 - Back up battery service in each central office.
 - Mobile power units that can be delivered on short notice and can be readily connected in offices without installed emergency power facilities.
- Informed employees as to procedures to be followed in the event of an emergency in order to prevent or mitigate interruption or impairment of telecommunications service, including rerouting of traffic around damaged facilities and the deployment of emergency power.

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@interstatetel.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2014

<703>

[illegible]

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330973
<015>	Study Area Name	WITTENBERG TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roxanne Hacker
<035>	Contact Telephone Number - Number of person identified in data line <030>	3208486641 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roxih@winterstatetelcom.com

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

July 2013

<810>	Reporting Carrier	Wittenberg Telephone Company
<811>	Holding Company	
<812>	Operating Company	Wittenberg Telephone Company

[illegible]

Wittenberg Telephone Company sent out a correspondence letter based on the FCC's Reform Order obligations to the tribal government in the area we serve, that letter is attached. The letter was addressed to contacts as provided by the National Congress of American Indian's Tribal Directory. **Wittenberg Telephone Company** did not receive any response from the Ho-Chunk Nation Tribe in our area.

Tribal Engagement – for ETCs that serve Tribal Lands

Obligations in the FCC's USF/ICC Reform Order

Requirements:

1. Needs Assessment and Deployment Planning- focus on Tribal anchor institutions
 - a. Tribal responsibility: Assessment of Tribes communication needs-specific communication goals, needs, priorities and uses. Identify community or anchor institutions that are central to deployment and consider economic factors/opportunities that would make a business case for deployment.
 - b. ETC responsibility: Articulate deployment priorities, process to determine these priorities and initial plans for deployment on Tribal lands, including timelines and prioritizing factors.
2. Feasibility and sustainability planning
 - a. Tribal government leaders and providers should be able to coordinate the feasibility and sustainability planning, by discussing specific challenges (rugged/remote terrain, poverty levels, sustainability) and additional resources that may be available to the tribal land (government programs that support infrastructure deployment or other business ventures).
3. Marketing services (in culturally sensitive manner)
 - a. Providers must report on their efforts to ensure that services on Tribal lands are marketed in a way that relates to the community, resonates with the consumers and stimulates adoption.
4. Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes
 - a. Both Tribal governments and providers should discuss the relevant rights of way and other permitting and review processes (including those set forth by the U.S. Department of Interior's Bureau of Indian Affairs (BIA)). Tribal governments should provide a comprehensive list of these processes and providers should provide documentation of all processes with which they currently comply.
5. Compliance with Tribal business and licensing requirements
 - a. Tribal governments should provide a comprehensive list of all requirements applicable to the provision of communications services.
 - b. ETCs should provide current evidence of compliance with any Tribal business practice license, if any.

WITTENBERG TELEPHONE COMPANY
104 W. Walker Street
P.O. Box 160
Wittenberg WI 54499

October 30, 2013

Ho-Chunk Nation
Jon Greendeer
PO Box 667
Black River Falls, WI 54615

Re: FCC Order 11-161, DA 12-1165 Tribal Land Engagement.

Dear Jon:

Wittenberg Telephone Company serves the Ho-Chunk Nation tribal area with phone and internet service. I am writing you today to initiate conversation with your Tribal government and leaders to discuss any and all options to better serve your lands with high speed technology. Specifically, I would like to discuss your specific communications goals, needs and priorities. We offer services to you today, and would like to initiate a conversation to see if there is anything we can do to assist you with further needs.

Please contact me at your convenience:

Allen Mahnke
104 W. Walker Street
PO Box 160
Wittenberg, WI 54499
715-253-2112
mahnke@wittenbergnet.net

Sincerely,



Allen Mahnke
Vice President & CEO
Wittenberg Telephone Company

LINE 1010 – VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$46.96, which includes the federal subscriber line charge ("SLC").

In the exchange of Elderon served by the Wittenberg Telephone Company, the single-line residential local rate, including any mandatory extended area service charge, is \$14.50. When the federal SLC (\$6.50) and other state fees are included, the rate becomes \$21.81.

In the exchange of Wittenberg served by the Wittenberg Telephone Company, the single-line residential local rate, including any mandatory extended area service charge, is \$14.50. When the federal SLC (\$6.50) and other state fees are included, the rate becomes \$21.93.

Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of \$46.96.

SAC: 330973

State: Wisconsin

Wittenberg Telephone Company

Form 481 Line No.: 1210 Terms and Conditions of Voice Telephony Lifeline

- Wittenberg Telephone Company offers Lifeline Service credit according to basic service requirements listed in Wisconsin Administrative Code 160.03 and 160.04:

PSC 160.03 Essential telecommunications services.

- 1) Each local exchange service provider shall make available to all its customers at affordable prices all essential telecommunications services.
- 2) "Essential telecommunications services" means all the following:
 - (a) Single-party voice-grade service with:
 1. Line quality capable of facsimile transmission.
 2. Line quality capable of data transmission as specified in s.PSC 160.031.
 3. Dual-tone multi-frequency touch tone and rotary pulse dialing operability.
 4. Access to emergency services numbers and 9-1-1 operability where requested by local authorities.
 5. Equal access to interlata interexchange carriers subject to federal communications commission orders and rules.
 6. Equal access to intralata interexchange carriers pursuant to schedules, terms and conditions imposed by commission orders and rules.
 7. Single party revertive calling, if 2 or more pieces of customer premises equipment can be simultaneously active on the line or channel being used by the customer.
 8. A reasonably adequate number of calls within a reasonably adequate local calling area as defined by the commission.
 9. Connectivity with all public toll, local, wireline and wireless networks, and with various internet service providers.
 10. Telecommunications relay service to facilitate communication between teletypewriter users and non-teletypewriter users.
 11. Access to operator service.
 12. Access to directory assistance.
 13. Toll blocking, 900 and 976 number blocking and extended community calling blocking options as specified in s.PSC 160.04.
 14. Intercept and announcements for vacant, changed, suspended and disconnected numbers in oral and TTY-readable formats.
 15. A directory listing with the option for non-listed and non-published service.
 - (b) Annual distribution of a local telephone directory in accordance with s.PSC 165.955.
 - (c) Timely repair.

PSC 160.04 Toll blocking.

(1) **BLOCKING OBLIGATIONS.** Every local exchange service provider in the state shall offer the capability to block all long distance calls and, separately, the capability to block 900 and 976 number calls and the capability to block extended community calling unless a timely waiver has been granted to the local exchange service provider by the commission.